

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON NON-REVISION PTO 298  
(ELECTION WAVE) CASES LISTED IN  
EXHIBIT A

JOSEPH R. GOODWIN  
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF  
SALIL KHANDWALA, M.D. FOR NON-REVISION PTO 298 (ELECTION WAVE)**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motions, memorandums and reply briefs filed in relation to Salil Khandwala for Ethicon Wave 1, Dkt. 2003 (motion), Dkt. 2004 (memorandum in support), Dkt. 2240 (reply) and Ethicon Wave 2, Dkt. 2469 (motion), Dkt. 2470 (memorandum), Dkt. 2618 (reply). Plaintiffs respectfully request that the Court exclude Salil Khandwala's testimony, for the reasons expressed in the Wave 1 and Wave 2 briefing. This notice applies to the following Non-Revision PTO 298 (Election Wave) cases identified in Exhibit A attached hereto.

Dated: December 13, 2018

Respectfully submitted,

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## EXHIBIT A

Alpha, Sheila	2:15-cv-08107
Baker, Freedom	2:12-cv-09647
Bush, Emily	2:13-cv-16317
Catlin, Margaret	2:16-cv-07227
Darga, Jessica	2:14-cv-28511
Fischer, Roberta	2:16-cv-08000
Lambert, Corrie Ann	2:12-cv-02183
Profitt, Miriam	2:17-cv-03526
Ratliff, Daphne	2:17-cv-00868
Snyder, Deborah S.	2:16-cv-04193
Spicer, Sarah L.	2:15-cv-14745

**CERTIFICATE OF SERVICE**

I hereby certify that on December 13, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett  
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